

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

STEPHEN ELLIOTT,

*Plaintiff,*

- against -

MOIRA DONEGAN, and JANE DOES (1-30),

*Defendants.*

**Oral Argument Requested**

No. 1:18-cv-05680-LDH-SJB

**DECLARATION OF MARTHA E. FITZGERALD**

MARTHA E. FITZGERALD declares as follows:

1. I am an associate at the law firm of Kaplan Hecker & Fink LLP and am counsel for Defendant Moira Donegan in this action.
2. I respectfully submit this declaration in support of Ms. Donegan's Motion to Dismiss the Second Amended Complaint.
3. Attached hereto as Exhibit A is a true and correct copy of Moira Donegan, *I Started the Media Men List*, THE CUT (Jan. 10, 2018).
4. In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed at: New York, New York  
May 8, 2019



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Martha E. Fitzgerald